

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC
REPAIR SYSTEM PRODUCTS LIA-
BILITY LITIGATION**

THIS DOCUMENT RELATES TO:

Raja Dobard v. Ethicon, Inc., et al. Case
No. 2:12-cv-07493

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

**PLAINTIFF'S DESIGNATION AND DISCLOSURE OF GENERAL
EXPERT WITNESSES**

Pursuant to Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiff Bonnie Blake (herein after "Plaintiff") submits the following Designation and Disclosure of Expert Witnesses and persons who may provide expert testimony pursuant to Rule 702 of the Federal Rules of Evidence. Plaintiff reserves the right to elicit testimony, either through direct examination or cross-examination, of all witnesses designated or identified by Plaintiff or Defendants as an expert or person with specialized knowledge, training, or experience. Plaintiff further reserves the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery

including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

GENERAL RETAINED EXPERTS

1) Dr. Bruce Rosenzweig (Urogynecologist)
Rush University Professional Building
1725 West Harrison Street, Suite 358
Chicago, IL 60612

Plaintiff refers Defendants to Dr. Rosenzweig's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Rosenzweig's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Rosenzweig, the exhibits that Dr. Rosenzweig may use to support his opinions, and Dr. Rosenzweig's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Rosenzweig's Expert Reports and all subparts and attachments thereto.

2) Dr. Vladimir Iakovlev, M.D. (Pathologist)
St. Michael's Hospital, Division of Pathology
30 Bond Street, Cardinal Carter, Room 2-093
Toronto, ON, M5B1W8
CANADA

Plaintiff refers Defendants to Dr. Iakovlev's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Iakovlev's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Iakovlev, the exhibits that

Dr. Iakovlev may use to support his opinions, and Dr. Iakovlev's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr.

Iakovlev's Expert Reports and all subparts and attachments thereto.

3) Dr. Jimmy Mays (Materials)
Department of Chemistry
University of Tennessee at Knoxville
655 Buehler Hall
Knoxville, TN 37996

Plaintiff refers Defendants to Dr. Mays' Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Mays' Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Mays, the exhibits that Dr. Mays may use to support his opinions, and Dr. Mays' qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Mays' Expert Reports and all subparts and attachments thereto.

4) Dr. Anne Wilson (FMEA) QA Consulting, Inc. 7500 Rialto
Blvd. Bldg. 1, Ste. 225
Austin, Tx 78735

Plaintiff refers Defendants to Dr. Wilson's Expert Reports, and all subparts and attachments thereto which sets forth his opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Wilson's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Wilson, the exhibits that Dr. Wilson may use to support her opinions, and Dr. Wilson's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Wilson's Expert Reports and all subparts and attachments thereto.

GENERAL RETAINED REGULATORY EXPERTS

Plaintiffs recognize that the Fourth Circuit has affirmed Judge Goodwin's decision to exclude evidence relating to a manufacturer's compliance with the FDA's 510(k) process. In the event of a contrary ruling, Plaintiffs reserve the right to designate the following General

Regulatory Experts:

5) Dr. Suzanne Parisian (Regulatory) MD
Assist, Inc.
7117 N. 3rd Street
Phoenix, AZ 85020

Plaintiff refers Defendants to Dr. Parisian's Expert Reports, and all subparts and attachments thereto which sets forth her opinions and the reasons and bases for them. These reports have already been served in this MDL. Dr. Parisian's Expert Reports and corresponding attachments set forth the facts, data and information considered by Dr. Parisian, the exhibits that Dr. Parisian may use to support her opinions, and Dr. Parisian's qualifications, publications, testimonial history, and compensation. Plaintiff hereby incorporates by reference Dr. Parisian's Expert Reports and all subparts and attachments thereto.

Plaintiff reserves the right to call any expert disclosed by any other party and thereafter deposed. Plaintiff also reserves the right to call additional, undesignated expert witnesses as allowed by law and in particular, any of Plaintiff's medical providers. Plaintiff further reserves the right to supplement the above list should another party disclose experts in areas other than those covered by the above individuals.

Dated: February 1, 2016

MICHAEL HINGLE & ASSOCIATES, LLC

/s/Michael Hingle

Michael Hingle, T.A. #6943

Bryan A. Pfleeger, #23896

Julie M. Jochum, #33463

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2016, I electronically served the foregoing document on counsel of record listed below.

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